

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
IN ADMIRALTY**

CASE NO. 0:23-CV-61696-AHS

STARBOARD YACHT GROUP LLC,

Plaintiff,

v.

M/V OCTOPUSSY, a 1988 Heesen built 143-ft. motor yacht,
Registry No. JMP15060, her engines, tackle, boats, gear,
Seakeepers, appurtenances, etc. in rem, and
CONTESSA MARINE RESEARCH LLC, in personam,

Defendants/Counter-Plaintiff,

v.

CHARLES JAKE STRATHMANN

**MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF STARBOARD
YACHT GROUP LLC AND COUNTER-DEFENDANT CHARLES JAKE
STRATHMANN**

Undersigned counsel respectfully moves this Court, pursuant to Local Rule 11.1(d)(3), Federal Rule of Civil Procedure 7(b), and the applicable Florida Rules of Professional Conduct, for entry of an Order permitting withdrawal of Phillip H. Hutchinson, Esq and Hutchinson Law Firm PLLC as counsel of record for Plaintiff Starboard Yacht Group LLC (“Starboard”) and Counter-Defendant Jake Strathman (“Strathman”), and in support states:

1. Hutchinson Law Firm and Phillip Hutchinson were retained by Starboard and Strathman and substituted in as counsel on May 29, 2025.

2. Irreconcilable differences have arisen between undersigned counsel and these clients such that continued representation is no longer possible.

3. As to Starboard Yacht Group LLC: undersigned counsel has advised the corporate plaintiff that it cannot proceed *pro se* and must retain substitute counsel admitted to practice before this Court.

4. As to Jake Strathman: undersigned counsel has advised Mr. Strathman of his right either to retain new counsel or to proceed *pro se* in this matter.

5. Trial is currently set for February 23, 2026, and discovery and dispositive motion deadlines have not yet expired, affording both Starboard and Mr. Strathman time to secure new counsel or otherwise prepare without undue prejudice.

6. Rule 4-1.16(b) of the Rules Regulating the Florida Bar, governs withdrawal of counsel under the circumstances of this case. Professional considerations necessitate undersigned counsel to seek withdrawal as counsel as irreconcilable differences have arisen between Hutchinson Law Firm, on the one hand, and Starboard and Stratham on the other hand. Rule 4-1.16(b) provide the basis for the withdrawal.

7. Pursuant to Local Rule 11.1(d)(3), undersigned counsel has provided written notice of this Motion to Starboard and Strathman, including a summary of upcoming deadlines and obligations.

8. Starboard's mailing address is as follows:

Starboard Yacht Group, LLC
Registered Agent: Matthew J. Valcourt
850 NE Third Street
Suite 208
Dania, FL 33004

Charles Strathmann
850 NE Third Street
Suite 208
Dania, FL 33004

9. The content of this motion has been presented in abbreviated fashion to ensure protection of any information falling within the ambit of the attorney-client privilege and to comply with all ethical obligations, including but not limited to, the rule of confidentiality encompassed by Rule 4-16 of the Rules Regulating the Florida Bar.

10. Upon withdrawal, Starboard will need a minimum of thirty (30) days to retain new counsel, and all pending discovery and proceedings should be stayed during such time.

11. This Motion will also be served on Defendants at the address provided by their previous counsel.

12. This Motion is filed in good faith, for the reasons highlighted herein, and not for a dilatory purpose.

WHEREFORE, undersigned counsel respectfully requests that the Court enter an Order:

- (a) granting this Motion to withdraw;
- (b) permitting withdrawal as counsel of record for Plaintiff Starboard Yacht Group LLC and Counter-Defendant Charles Jake Strathmann;
- (c) directing Starboard Yacht Group LLC to obtain substitute counsel within thirty (30) days; and
- (d) granting such other and further relief as the Court deems just and proper.

Respectfully submitted,

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phillip@hutchlawfirm.com
themis@hutchlawfirm.com

s/ Phillip H. Hutchinson
Phillip H. Hutchinson, Esq.
Florida Bar No. 0137170

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on _____, I electronically filed the foregoing with the Clerk of Court using CM/ECF, which will serve notice on all counsel of record. I further certify that a true and correct copy of the foregoing has been served via electronic mail to:

Starboard Yacht Group LLC
850 NE Third Street
Suite 208
Dania, FL 33004

Jake Strathman
850 NE Third Street
Suite 208
Dania, FL 33004

s/ Phillip H. Hutchinson
Phillip H. Hutchinson, Esq.
Florida Bar No. 0137170